



**S P I R E L A W**

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**Via Electronic Filing**

The Honorable Anne Y. Shields  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**December 8, 2023**

Re.: Ingram-Luna v. All Call LLC et al (2:23-cv-00228)

Letter motion requesting extension of deposition deadline

This firm represents Defendants, All Call LLC and Kristina Edwards Haydel. With the Plaintiff's consent, we write to request that the deadline to complete depositions in this case be extended from December 15, 2023, to January 15, 2024.

The parties have agreed to this extension due to Defense counsels' other case obligations, including other scheduled depositions, dispositive case briefing, and the Parties' schedules during the Holiday Season. The Parties intend to schedule depositions, if authorized, promptly in the new year. This is the first request to extend the deposition deadline set forth in the September 21, 2023, Scheduling Order.

We thank the Court for its attention to this matter.

Respectfully,

Ian E. Smith, Esq.  
Partner, Spire Law, LLC

